Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of Numbering Resource Optimization	CC Docket No. 99-200

COMMENTS OF BELL ATLANTIC

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Summary

There are many things the industry and regulators could do to allow telephone numbers to be used more efficiently X the length of the discussion in the NANC Report and the Commission=s Notice are proof of that fact. Some of these measures can have a significant effect and must be implemented without further delay. At the other extreme, the costs of some proposals far outweigh any possible benefits, and Bell Atlantic[1] urges the Commission to reject such proposals. In between are a variety of things the Commission could do that might be helpful, but which are not really significant. The Commission should adopt measures of this sort only if they can be implemented without creating large new regulatory regimes and bureaucracies.

The first step the Commission should take is to immediately establish a plan for thousands-block number pooling for local exchange carriers. The industry has agreed on national standards and is awaiting Commission direction to begin. This action alone will

[1] Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company, New England Telephone and Telegraph Company and Bell Atlantic Mobile.

significantly extend the life of the North American Numbering Plan. However, the plan for thousands-block pooling in the NANC report did not address CMRS providers, and those providers should be given a choice of participating in pooling or agreeing to strict number utilization standards. Bell Atlantic believes that pooling as recommended by the NANC can be fully implemented throughout its territory in somewhat more than two years after an order from the Commission, but that order is necessary to get the process started.

Thousands-block pooling will not be inexpensive. Most carriers are free to recover these costs however they choose. Incumbent LECs, however, need regulatory approval. The Commission should adopt a mechanism like the one for number portability and allow these carriers to recover these costs by adding a few cents to their number portability surcharges.

Expanding the D digit would significantly increase the volume of telephone numbers and must be seriously considered. The Commission should require the NANC to study the costs and to make a recommendation. The Commission should also set the industry on a course toward ten-digit dialing of all calls.

Rate-center consolidation is within the jurisdiction of the states and should be left for those agencies to handle. The best way to give carriers incentives to consolidate their rate centers is to ensure that they can recover their out-of-pocket costs of doing so, including their lost toll revenues.

Bell Atlantic agrees with the Commission=s decision not to pursue individual number pooling at this time X while it certainly looks good in theory, it is not at all clear that it will be needed after thousands-block pooling has been implemented. The industry and its customers should not have to pay today for new systems that might delay NANP exhaust by a few years in the middle of the next century and which could well be made unnecessary by changes in the market or the technology. Unassigned number porting is not a conservation measure at all and should not be implemented.

The Aadministrative@ measures suggested in section IV of the Notice are a mixed bag. Some are necessary to allow NANPA to better carry out its job of NPA administration and planning (*e.g.*, requiring timely forecasts). Others are aimed at those carriers that do not use numbers properly and efficiently (*e.g.*, enforceable guidelines for when a carrier can get an NXX code, audits and sanctions). Some are clearly useful and can be implemented with relatively little cost. However, in reviewing these suggestions, the Commission should be careful not to impose obligations on the industry and NANPA just because it might be Anice@ to have certain information or to generate some report. Number administration should not become the new telecommunications industry bureaucracy.

All these changes cost money. All telecommunications carriers should share the costs of protecting the NANP, because all will benefit from its preservation. Every provider in every segment of the industry would be adversely affected if the NANP were expanded. Therefore, all telecommunications carriers should continue to pay for NANPA.

For the Commission=s convenience, these comments will deal with the issues as they appear in the Notice.

1. Administrative Measures

Bell Atlantic generally agrees with the Commission=s conclusion that these administrative measures will improve efficiency of number use. Some measures may be implemented more quickly and at very little cost, although this is not true of all the measures discussed in the Notice.

A. Definitions of Categories of Number Usage

Bell Atlantic supports the standard set of definitions developed at INC and NRO. These definitions should be incorporated in appropriate industry guidelines.

These definitions should not be made part of the Commission=s regulations.[2] Those rules should refer to the industry guidelines and require carriers and state regulators to follow them. This gives the industry the flexibility it needs to agree to modifications in the guidelines without going through Commission rulemaking procedures, while also giving them the effect of law.

The Notice asks about the types of uses carriers have for certain types of administrative numbers.[3] Employee/official numbers are numbers the carrier uses to conduct its own business, including, for example, those to allow customers to reach its business office or repair centers. Test numbers are used for inter- and intra-network testing. Test numbers typically represent a small quantity of numbers that can be used to access test circuits to test facilities prior to initiating service or to test new services prior to actual deployment.

Bell Atlantic supports the aging guidelines adopted by the NANC.[4] These guidelines provide carriers sufficient flexibility to meet the needs of different customers when numbers are disconnected. The NANC aging guidelines also recognize that some states have adopted rules regarding minimum aging intervals for local exchange carriers (*e.g.*, New Jersey, Delaware and Maryland), which should be accommodated. The NANC guidelines also provide sufficient

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[2] Notice & 40.

[3] Notice & 41.

[4] See Notice & 42.

flexibility to age numbers until a new directory is published. Bell Atlantic does not support mandatory aging limits as short as 90 to 120 days because such intervals would have adverse effects on customers who could be assigned numbers that are still in the published directories. However, service providers should be permitted to use shorter periods when conditions warrant, such as in jeopardy situations. Wireless carriers typically use shorter aging periods (Bell Atlantic Mobile typically uses 60 to 90 days). There is certainly no need to place aging limits on the wireless industry if wireless carriers are required to abide by a number utilization standard.

A three- to five-day limit on pending orders[5] is too short. Many service orders take far longer than this to process and become operational, especially those for complex business services. Longer periods may also be the result of customer request (*e.g.*, a residence customer=s wanting her second line installed on a day when she will not be at work).

INC recently agreed to remove the definition of Aported-out number≅[6] from the standard set because it is not currently used in the industry guidelines and it is not necessary X ported-out numbers are always in one of the other standard categories (assigned, aging or reserved). For utilization reporting purposes, ported-out numbers should be reported as Aunavailable≅ by the code/block holder.

Bell Atlantic favors the approach to reserved numbers outlined in paragraphs 46 and 47 of the Notice. Requirements of this sort will provide more than adequate documentation of the reservation to allow an auditor to determine if the service provider is complying with the guidelines. We strongly oppose MCI=s proposal to make reserved status dependent on the existence of Aa legally enforceable written agreement.≅[7] Service provider employees should be

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[5] Notice & 43.

[6] Notice & 45.

[7] Notice & 48.

able to make decisions about whether a number is reserved based upon objective criteria; they should not have to keep lawyers by their sides to advise whether some apparent reservation is Alegally enforceable.≅ Auditors would be faced with making legal assessments as to whether such agreements exist for each and every reservation. Those carriers who favor this approach apparently want to make the process more complex and burdensome so that it will be that much more difficult to determine if they are complying with guidelines.

Bell Atlantic supports the reservation intervals recommended by the NRO. Forty-five days[8] is too short a period and would inhibit a carrier=s ability to meet differing customer needs. Customer requirements for reservations for geographic numbers are substantially different than for toll free numbers. Large business/government customers typically plan their telecommunications requirements months in advance of actual service activation. Those same customers want the flexibility to control the activation of additional numbers which are reserved for that customer=s use when they expand.

Neither carriers nor customers should be required to pay fees to reserve telephone numbers.[9] Rather, financial penalties should be imposed on carriers that do not comply with the industry reservation guidelines. These penalties should be commensurate with the violations, *e.g.*, whether the violation was intentional or accidental and the degree of the non-compliance.

A soft dial tone number is Aa number temporarily assigned to line equipment and facilities which permits restricted dialing.≅[10] Numbers used for soft dial tone are considered Aavailable,≅ *i.e.* they are not utilized because they are not yet assigned to an end user customer. These

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[8] Notice & 49.

[9] Bell Atlantic does have some tariffs which assess number reservation fees. It has already tried to remove them in some areas and will continue to do so.

numbers should not be classified as administrative because administrative numbers are Aunavailable≅ for the purposes of calculating utilization and contamination blocks.

The Commission is correct that the definitions of Aworking≅ and Aassigned telephone numbers≅ in the CO Code Guidelines overlap.[11] The term Aworking telephone numbers≅ pre-existed the standard definitions and should now be adjusted to reflect the new standard definitions. The term Aworking telephone numbers≅ should be replaced by Aunavailable telephone numbers,≅ which has already been defined as numbers that are administrative numbers, aging numbers, assigned numbers and reserved numbers. TLDNs are already included in the administrative category.

Bell Atlantic recommends two additional types of Aunavailable numbers≅ applicable to the wireless industry.[12] First, wireless Type 1 interconnection arrangements are no longer useful in many areas because of limited feature capability and are being phased out. If a CMRS provider still has some such numbers in use, it will not be able to return the number block to the local exchange carrier. However, the unused numbers in that block are not available for use and should not be counted as available. Second, some Agrandfathered≅ wireless numbers are not available due to a state commission order (*e.g.*, in New Jersey).

B. Verification of Need for Numbers

When applying for an initial code, a carrier should be required to demonstrate both a need for and a readiness to use the code. For example, under the emergency procedures for area code 516, a carrier must supply to NANPA documentation that within three months it will be

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[10] Notice & 50. Some service providers use this term to refer, in addition, to seasonal suspensions and other arrangements in which the telephone number is assigned to a customer.

[11] Notice & 53.

[12] Notice & 52.

interconnected and have sufficient operable facilities in the switch/rate center in which the initial code is requested. The carrier applying for a code should be responsible for providing this evidence; NANPA should not be required to seek it out.[13] Carriers should also be required to demonstrate that they are licensed/certified in the specific areas for which they are requesting codes.

Applicants must continue to demonstrate need for growth codes. Applicants for such codes must currently submit the Months-to-Exhaust Worksheet with their applications to provide both growth history (*i.e.*, utilization) as well as forecasted growth. These combined data should be sufficient for NANPA to assess the validity of requests. Substantial penalties, such as withholding number resources or imposing fines, should be imposed on any carrier that falsifies growth or forecast information. Random audits or audits for cause will also provide incentives for accuracy. If a service provider projects growth that deviated considerably from its previous historical growth rate, then it should be required to provide NANPA with additional information to support its projection.

Bell Atlantic generally opposes fill rate requirements. However, fill rates could be a substitute for requiring wireless carriers to deploy number portability for the purpose of participating in pooling. The Commission certainly should not prescribe a single mandatory fill rate that a carrier must reach before it may be assigned an additional NXX code. First, fill rates may increase as well as decrease over time because of changes in demand. Moreover, usage patterns vary significantly by geography and technology. While an 80 to 90 percent trigger might be satisfactory in slow-growing or rural exchange areas, such a figure would be unacceptable in areas with more rapid growth or where number-intensive services are popular because there would not be sufficient time before the exchange code exhausts to obtain and activate a growth

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[13] See Notice & 59.

code. If such a requirement were enforced by self-reporting, there would be little change from the current situation, where providers must certify that they will exhaust their supply within the next 12 months. The current months-to-exhaust standard is a much better approach because it allows a service provider to develop a central office profile which considers the characteristics of the area served by that office, *i.e.*, rural/urban, residential/business, growth vs. non-growth area. This approach smoothes out the effects of the spikes in demand which cannot be accomplished by fill rate measures.

Adoption of a percentage utilization threshold[14] would be costly and cumbersome,[15] and thresholds cannot be set in a way to ensure competitive neutrality and non-discriminatory access to telephone numbers.[16] The use of utilization thresholds to determine eligibility for numbering resources will also introduce another complex set of administrative processes which will have to be maintained on a near-real-time basis for NANPA to determine whether a carrier is eligible to be assigned a code. This approach has far too much regulatory overhead and should be rejected.

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[14] Notice & 63-68.

[15] The Commission recognizes the many challenges and complexities such an approach would entail X *e.g.*, should thresholds be at the NPA or rate center level; should newly acquired NXXs be included in the calculation; how to account for geographic variances across an NPA; should there be different levels for Asmall≅ vs. Alarge≅ carriers. All these add to the complexity, and thus cost, for both the Code Administrator and service providers and ultimately end users.

[16] For example, it would disadvantage carriers that provide service in rural areas or other places where there are relatively few customers.

Creation of new services that depend on telecommunications and the immediate availability of telephone numbers seems to be a trend that will continue in the NANP area. Relying on utilization rates is more suited to a stagnant, non-fluctuating market of telecommunications services, not the competitive environment the Commission is trying to foster.

C. Reporting/Record-keeping Requirements

All users of numbering resources should supply forecast and utilization data to the NANPA, at intervals and to the level of detail contained in the NRO recommendation to the NANC. These data should be submitted to the NANPA and/or the pooling administrator, depending upon whether pooling has been implemented or is planned in a particular area, and would be available to states subject to limitations agreed upon at the NANC.[17] NANPA should continue to be responsible for NPA and NANPA exhaust projections.

All service providers should also be required to report utilization information as all telephone numbers Aunavailable,≅ while retaining the detailed number status information for audit purposes or if required to meet a specific NANPA or regulatory request. NANPA does not need this additional information to project NPA/NANP exhaust. Requiring submission of that level of detail on a routine basis would place additional administrative burdens on both carriers and NANPA (which would have to aggregate the numbers to make them useful) with no significant benefit. This additional information could, of course, be made available in connection with an audit.

Data reporting should be on a semi-annual basis.[18] Quarterly reporting places substantial additional ongoing administrative burdens on carriers and NANPA. It is not clear that NANPA

[17] State regulators should have access to aggregate data for a stated purpose. State regulators can get carrier specific data only in states where a legally enforceable confidentiality agreement is in place and only after notification of the carrier involved.

[18] Notice & 77.

could process all the data on a quarterly basis and develop new exhaust projections each quarter. Regardless as to how mechanized the data collection process may be, both carriers and NANPA must perform certain manual analyses and review of the data.

Small carriers should not be excluded from reporting requirements nor should their obligations be scaled back.[19] In fact, it might be easier and cheaper for small carriers to report than larger ones.

Finally, Bell Atlantic supports the NRO hybrid proposal which modifies the LINUS plan, but still meets the Commission=s objectives without placing undue burden and costs on carriers and NANPA without comparable benefits.[20]

D. Audits

Rules and reporting are only part of the answer. Data collection must be supplemented by audits to ensure carrier compliance. These audits should not be limited just to verification of forecast and utilization data submitted, but must also address carriers= compliance with other aspects of industry guidelines and other NANP resources (*e.g.*, 555 numbers, CICs, 500 codes). The Commission should have the NANC complete a comprehensive set of audit guidelines and requirements rather than trying to address all the audit details in this rulemaking. Bell Atlantic supports Afor cause@ audits, and the NANC should develop specific recommendation on criteria for such audits.

Audits should not be regularly scheduled on some preset interval (*e.g.*, three to five years). A totally random approach is preferable to regular scheduling, similar to what is

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[19] Notice & 79.

[20] Notice && 80-82.

contained in the NANC=s Pool Administrator=s Requirements. Both the geographic area and the carriers selected would be random. With this approach, any area and any carrier could be selected. This method better meets the Commission=s objectives because any carrier could be subject to an audit in any area where it provides service. With regularly scheduled audits, if a carrier has been audited in year one of the cycle, the carrier would know that it could not be audited again until the next cycle. This could encourage carrier=s to become lax and does not provide the same incentive for compliance as the totally random approach achieves. It may also be beneficial to require a certain number of random audits per year per region of the country.

The NANC should complete a comprehensive audit framework with the INC incorporating those audit requirements into the various industry guidelines. The Commission should direct the NANC to select an entity to perform the audits.

E. Enforcement

And rules, reports and audits are meaningless without enforcement.

NANPA must withhold resources as a sanction for failure or refusal to provide forecast and utilization data. Another approach would be for NANPA to assess a fee for each day past the deadline that a carrier fails to submit the data and to increase that fee as the delinquency grows longer. After some period, say 30 days, the matter could be turned over to the Commission for appropriate regulatory action.

While the Commission should not put industry guidelines into its regulations, it should give those guidelines the force of Commission rules. Violation would therefore subject the carrier to the full range of penalties and sanctions available to the Commission.

Number administration enforcement responsibilities should not be turned over to the

states.[21] One of the reasons for having a national number administrator is to ensure consistent and uniform number administration nationwide. This should include the approach to enforcement of the national number administration guidelines and any associated sanctions for non-compliance. Fragmenting the enforcement across 51 regulatory jurisdictions could result in disparate treatment based upon state-specific issues or concerns and could be counterproductive to the Commission=s objectives. It would also require NANPA to perform this aspect of number administration based upon state-specific requirements.

The evidence is clear that some carriers are abusing numbering procedures and are using numbers in wasteful ways. For example, in one Bell Atlantic state, it became apparent that a certain carrier was improperly using the assignment of NXX codes to misidentify toll calls as local to permit its customers to allow callers to reach them toll free. This was done in a way that consumed 52 NXX codes ∏ more than half a million telephone numbers ∏ but really used very few of them to provide service. The carrier obtained numbers for every rate center or other local calling area, even areas where the carrier did not plan to have end user customers. While the state commission in this case was able step in because it found the carrier=s activities inconsistent with state rules, this might not always be the case, and NANPA and the Commission should be watchful for such misuses.

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[21] Notice & 93.

F. Reclamation of NXX Blocks

As to the issue raised in paragraph 96 of the Notice, the INC is working to change the guidelines to require that at least one number in a code be activated for a customer for that code to be considered Aactivated.≅ This requirement already exists in the INC pooling guidelines. There is also a proposed change to correct the language in section 5.2.9.[22]

Code activation should be based upon assignment of numbers to customers, and the INC has already agreed to this change. Furthermore, even if a carrier activates numbers in a certain NXX or block to prevent reclamation, it will not receive another block until it could justify its need with historical utilization and forecasts.

The NANPA should initiate code reclamation 60 days following the expiration of the applicable activation deadline.[23] The code reservation period should be reduced from 18 months to 3 months and the reservation extension from 6 months to 30 days. The Commission should direct INC to include these changes in the industry guidelines and not adopt them as Commission rules.

There is no need for delegation of authority to states to order reclamation. Number reclamation is no different than any other administrative duty of the NANPA. If the NANPA is operating under Commission authority which requires it to perform administration in accordance with the industry guidelines in effect, then there is no need for states to order reclamation. Rather than referring disputes to the INC, the NANPA should follow the dispute resolution process established by the NANC. There is nothing to be gained by state oversight of disputes.

G. Cost Elements and Cost Recovery

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[22] Notice & 97.

[23] Notice & 99.

The Commission has proposed a wide range of administrative measures and seeks a breakdown and comment on these particular costs. First, it is important to estimate the costs of purely administrative functions such as the billing and collections element (NANPA portion). These are best provided by NANPA.

In the Notice, the Commission proposed to allocate these costs according to the current NANPA cost allocation formula, gross revenues less payments to other carriers.[24] Bell Atlantic would have opposed that proposal.[25] However, after the Notice was issued, the Commission adopted an order in another docket that changed the NANPA cost allocation formula to end user telecommunications revenues.[26] Bell Atlantic fully supports this allocator.

The costs of the administrative solutions should be borne by *all* telecommunications carriers, not just those that receive numbering resources. The use of NPA-NXXs facilitate the addressing function within the public switched network and benefits every telecommunications carrier. If numbers are not used efficiently, all telecommunications carriers are hurt.

2. Other Numbering Optimization Solutions

Some of these proposals can significantly improve number utilization X thousands-block pooling and ten-digit dialing X and the Commission should adopt them. Rate center consolidation should be left to the states.

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[24] Notice & 103.

[25] After the Commission adopted this rule for NANPA costs, it had occasion to consider the same issue in connection with two other cases, number portability administration and universal service. In both cases, the Commission departed from its NANPA approach and concluded that the fairest allocator was total end user telecommunications revenues. *Telephone Number Portability*, 13 FCC Rcd 11701 & 105 (1998); *Federal-State Joint Board on Universal Service*, 12 FCC Rcd. 8776 && 843-47 (1997).

[26] *1998 Biennial Regulatory Review X Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Services, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms*, Report & Order & 59, CC Docket No. 98-171 (rel. July 14, 1999).

A. Non-LNP-Based Solutions

As the Commission points out, rate center consolidation is a matter of state jurisdiction, and it should be left entirely in the hands of the states. In contrast, the Commission must take the lead in requiring the completion of the transition to ten-digit dialing of all calls.

i. Rate Center Consolidation

Rate center consolidation is already a matter of state jurisdiction, and the Commission need not delegate any authority to the states to permit them to consolidate rate centers.[27] While rate center consolidation may appear to be an attractive way to conserve numbering resources, it is the state regulators, who are most knowledgeable about local calling patterns and customer needs, who should decide where and when to use this conservation tool. As the Commission noted, Asome states are enthusiastic about implementing this measure, others contend that rate center consolidation may not be the best solution for their particular circumstances.≅[28] The Commission should not do anything to encourage (or discourage) its use.

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[27] Notice & 117.

[28] Notice & 115.

The Commission asks whether there are ways to Acreate incentives to encourage incumbent local exchange carriers (ILECs) voluntarily to combine rate centers for the purpose of improving the efficiency of number utilization and slowing NPA exhaust rates.≅[29] The answer, of course, is, AYes.≅ It is very expensive for a carrier like Bell Atlantic to implement rate center consolidation. The costs are of two types. First are the costs to implement it in Bell Atlantic=s network and support systems.[30] The other cost is the loss of toll revenues for calls between customers who are now in the same rate center. Any rate center consolidation plan must permit carriers to recover their out-of-pocket costs, irrespective of any price cap or rate stabilization plans. It must also recognize that rate center consolidation has made the consumer=s local service more valuable by turning toll into local calls and permit the local carrier to charge customers for it accordingly.

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[29] Notice & 118.

[30] For example, Bell Atlantic would have to reprogram all local/toll routing and rating tables in its switches, determine costs of and add new facilities required due to increased toll-to-local calling, program new exception tables, reprogram all systems which use V/H coordinates, determine interoffice trunking requirements for new toll-to-local routes, re-engineer trunks/switching, determine impact on interexchange carrier POPs, update billing systems to ensure proper rating of calls, update internal/external training material, and revise all affected methods and procedures.

The Commission also asks for comment as to whether there are ways to separate the call rating functions from the call routing functions, which would result in a reduced demand for NXX codes.[31] This, of course, goes well beyond rate center consolidation, is within the Commission=s exclusive jurisdiction and should be done, if at all, on a uniform national basis. The Commission correctly identifies a number of problems with the Colorado proposal to do this,[32] and any plan of this sort would require major network modifications and changes that would not have to be undertaken for any other purpose. Bell Atlantic would expect that the magnitude of these changes would be even greater than those involved in number portability. Any such proposal should not be considered until after number pooling has been implemented and only if it still appears that further conservation measures are necessary.

ii. The D Digit and Ten-Digit Dialing

Almost all the measures discussed in the Notice are designed to use the existing number resource more efficiently. Some will be useful as new area codes are introduced, but are of little value in extending the life of existing codes. One measure X allowing the first digit of NXX codes to be A0≅ or A1≅ X would actually expand that resource, and could expand it by 25 percent.

It is much simpler to say that the Commission should change the numbering format than it is for the industry to do it. As the Commission and the industry found when they introduced interchangeable NPAs, the process was complicated and not inexpensive. However, it would be irresponsible of the Commission and the industry not to give serious consideration to a plan that

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[31] Notice & 119.

could add two million telephone numbers to every area code, both existing and new.

For these reasons, the Commission should promptly require the NANC to conduct a comprehensive study of the impacts of opening the D digit. Based upon that assessment, a determination could then be made as to when implementation might be feasible. Because modifications would be required to allow the network and customer equipment to recognize the new format of exchange codes, broad industry input on the implementation date is important.

Ten-digit dialing, of course, must be in place before the D digit is expanded. Moreover, ten-digit dialing provides a variety of benefits in its own right. The Commission should therefore establish a plan for the implementation of ten-digit dialing for all calls.

Ten-digit dialing facilitates the elimination of protected codes and immediately frees up more numbers for assignment to customers. It provides a uniform, consistent way for consumers nationwide to dial all calls and would end the confusion over how to place calls. It would also reduce the number of mis-dialed calls, calls dialed with too many or too few digits.

Ten-digit dialing is not a radical departure from accepted practices. It is simply the next logical step in telephone dialing patterns. In the course of its history, the industry has moved steadily along the evolutionary path of having callers dial more digits to complete their calls. In the beginning, callers dialed no digits at all X they gave the operator the name of the person they wanted to talk to or told her the person=s number. When they did start to dial, it was only a few digits. Eventually, seven digits became the norm. In many communities, there surely were complaints about having to dial Aextra@ digits when the system changed from four to seven.

Then, with the advent of direct-dialed long distance calls, ten-digit dialing was introduced.

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[32] It Awill require that carriers complete a query for every call and modify their databases to include additional information, such as network addresses, LRNs, and/or V&H coordinates for the calling and called parties, on the SS7 call record. Furthermore, carriers may have to develop systems to inform consumers whether they are making a toll or local call through

While ten-digit dialing was the exception to the rule ten or twenty years ago, it is rapidly becoming the norm. Most toll calls (both inter- and intraLATA) are dialed with ten digits. In fact, a growing number of toll calls are dialed with even more than ten digits, through the use of access codes. The rapidly growing toll-free marketplace (800, 888 etc.) is wholly ten digit. Many local calls are also dialed in that way today ∏ for example, local calling throughout Maryland, in the Philadelphia area and most local calls in the Washington area. Area code relief has increased ten-digit dialing of local calls and will continue to increase it, whether area code splits or overlays are employed. Wireless customers must always dial ten digits when making local calls while roaming outside of their Ahome≅ region. Where it has been adopted, ten-digit dialing has worked without problems. Bell Atlantic=s experience with ten-digit dialing in two area code overlays has been overwhelmingly positive.[33]

The Commission has exclusive jurisdiction over number administration, and it must lead the way. Adopting a comprehensive plan now will avoid countless case-by-case controversies in the future. While this task is far from simple and cannot be accomplished without significant consumer education and involvement, it will bring broad public benefits.

The Commission should not merely Aencourage states to implement ten-digit dialing as a priority.≅[34] Encouragement just won=t get the job done. Delegating this task to the states will result in a continuation of existing political sensitivities around ordering this issue.

The Commission asks Awhether the ability to implement easily area code overlays could

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an audible or visual method.≅ Notice & 119.

[33] Calls to the Maryland commission were down to no more than one call per month just two months after the conversion to mandatory ten-digit dialing throughout the state. This is in stark contrast to the 201/908 New Jersey area code split where even after two years 200,000 calls per day were still being routed to intercept announcements because of mis-dialed calls to numbers which had been changed to the new area code.

[34] Notice & 126.

provide a disincentive to use existing resources more efficiently.≅[35] The answer is clearly, ANo.≅ Opening new area codes is never Aeasily≅ done. Although splits are the most costly option, even an overlay costs Bell Atlantic millions of dollars. Efficient use of numbers in the ways described in these comments is always easier.

The Notice asks Awhether D digit expansion may be implemented on a statewide or NPA-wide basis, rather than at a mandatory national level by all service providers≅[36] and whether states may Aindependently implement the expansion of the D digit as a numbering optimization measure at the present time.≅[37] This change (like the introduction of interchangeable NPAs and the expansion of carrier identification codes) must be done on a coordinated nationwide basis. It may not be delegated to the states to implement as they so choose. This is because technical modifications will be required to all carrier networks and support systems as well as customer premises equipment (*e.g.*, PBXs) to accommodate the change in telephone number format. All networks must be able to recognize the central office code configurations 0XX and 1XX as a valid destination within the NANP. This requires changes by all users of the NANP at the same time.

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[35] Notice & 125.
[36] Notice & 127.
[37] Notice & 129.

B. Number Pooling

Bell Atlantic supports the recommendations contained in the North American Numbering Council=s report. This report represents the fourth consensus recommendation of thousands-block number pooling in preference to other proposed pooling options. The Commission should quickly approve this proposal so that the industry can focus its efforts on getting the technology developed and deployed to prevent more area codes from exhausting prematurely. At the same time, the Commission must devise a cost recovery mechanism that fully compensates carriers for the extraordinary expense of pooling. Bell Atlantic, therefore, supports the Commission=s tentative conclusion[38] that implementing thousands-block pooling in major markets is an important numbering resource optimization strategy that is essential to extending the life of the NANP.

Bell Atlantic also supports the Commission=s tentative conclusion that individual telephone number pooling should not be pursued at this time.[39] Rather, the industry and the Commission should monitor developments under thousands-block pooling and determine whether further steps are necessary.

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[38] Notice & 138.

[39] Notice & 141.

The Commission asks "whether state commissions should make the determination to allow carriers to use UNP in a given area."[40] No, they should not. Giving states the authority to make this determination would provide an incentive to mandate, rather than allow, carriers to use UNP in a vain attempt to defer the need for area code relief. UNP is a marginal optimization measure at best, still requires the assignment of numbers to carriers in blocks of 10,000, would require standards and guidelines that do not exist at this time, and would require development work for many carriers. As such, it would require the industry to shift its focus from thousands-block pooling to UNP, delaying the availability of that clearly superior measure.

i. Pooling Roll-out

The Commissions tentatively concludes "that any deployment schedule for thousands-block pooling should initially be tied to the largest 100 MSAs."[41] This does not go far enough, and there is no reason not to go farther.

Thousands-block pooling should be deployed everywhere that permanent number portability is available, and by every carrier which is number portability capable. The schedule for deploying thousands-block pooling across the country should be formulated by the industry under the guidance of the NANC. Where there is no consensus, the Commission should make the decision.

It does not make sense to link thousands-block pooling to MSAs. The NANP is not based on MSAs (but rather on NPAs and rate centers), and the deployment of thousands-block pooling should also be based on NPAs. This type of deployment will reduce the level of complexity and costs associated with number pooling administration and maintenance as well as optimize the benefits of pooling.

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[40] Notice & 142.

After the systems have been upgraded to accommodate thousands-block pooling (approximately 16 months for Bell Atlantic=s telephone companies), implementation can be completed within a year. Because this period is so short, there is no need for a staggered, multi-phase schedule like the one for number portability.[42]

Bell Atlantic finds it odd that the Commissions asks whether it has the legal Aauthority to order deployment of LNP for thousands-block pooling purposes.≅[43] The Commission clearly has exclusive jurisdiction of telephone number administration. Thousands-block pooling fits squarely within that authority. The Commission, however, should not delegate its number administration authority to the states because of the need to maintain uniformity and consistency in this area.[44]

The Commission asks who should decide whether to implement pooling in a given area and whether individual states should be allowed to change the national schedule.[45] The answer is that pooling should be implemented ubiquitously and, therefore, there is no decision of this sort that needs to be made. As discussed above, the industry and the NANC, in the first instance, should develop a plan for *when* pooling will be implemented. If the industry, under the guidance of the NANC, has determined that pooling will benefit users in a particular NPA, it is in the best interest of preserving the NANP to continue with that deployment and not allow a veto by state commissions.[46]

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[41] Notice & 144.

[42] Notice & 154.

[43] Notice & 145.

[44] Bell Atlantic has no comment on the various questions concerning how number portability might be deployed in areas where it is not now available (Notice && 145 50) because Bell Atlantic will have ubiquitous number portability by October of this year.

[45] Notice & 146-47.

[46] In particular, the implementation of a rate-center consolidation plan should not be grounds for delaying pooling. Notice & 151.

To the extent that the industry, the NANC or the Commission must set priorities for exactly when pooling would be introduced in a particular NPA, those priorities should be based upon where pooling will do the most good X that is, the length of time that pooling can extend the life of an NPA. For example, pooling will do the most good in new area codes, so that they can be administered in the most efficient way from the beginning. If an area code is already almost at exhaust, pooling will do little good, and such an area should not be made a priority for pooling implementation.

ii. Implementation Time Frame

Bell Atlantic agrees with the implementation timing sections of the NANC report and expects that its telephone companies can begin to deploy thousands-block pooling approximately 16 months after a Commission order.

iii. Non-LNP-Capable Carriers

All local exchange carriers that provide service within Bell Atlantic=s territory should be providing number portability by the end of this year, so questions concerning Anon-LNP-capable≅ LECs should not be relevant in these areas.[47] In 1998, Bell Atlantic advised the industry of its planned implementation, and it also requested that all other LECs provide number portability on the same schedule. All these carriers should be required to participate in pooling.

CMRS providers are not required to have number portability capabilities for a few more years, and many have questioned whether there is a need for these carriers ever to have it. Thousands-block pooling should not wait for CMRS providers to be ready for it, and the Commission should not design a pooling system based on the assumption that CMRS providers will participate. At the same time, no one could reasonably support a system that required some carriers to participate in pooling while other carriers had no number conservation obligations.

One way to address this issue would be to give CMRS providers a choice X either to participate in thousands-block pooling or to agree to strict number utilization standards. For example, a CMRS provider might be able to receive an additional NXX code only if it attested to some percentage utilization level in its existing codes in the NPA. Such an approach would advance the Commission=s number resource optimization goals and not put the entire burden of doing so on the wireline carriers.

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[47] Bell Atlantic does not know the number portability deployment status in independent telephone company territories in the states it serves.

The Colorado rural LEC proposal[48] involves using the SS7 network to transport the information required for the rating and routing of every call. This proposal would involve modifications to the SS7 network as well as potential system development to inform consumers of what type of call they are making. It is not at all apparent that this would be less costly than requiring non-LNP-capable carriers to deploy LNP. Furthermore, this would place additional requirements on LNP-capable carriers to modify their networks and systems. The Commission should not require this approach at least until the national industry standards groups have had an opportunity to thoroughly investigate it.

The Notice also seeks comment on how requests for numbering resources should be sequenced by the administrator to avoid unfair discrimination in favor of either pooling participants or non-pooling participants.[49] Bell Atlantic supports the thousands-block pooling and CO code administration guidelines adopted by the INC and believes that these guidelines will avoid unfair discrimination because they require that numbering resources be assigned on a first-come-first-served basis.

C. Pooling Implementation Issues

i. Technical Issues

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[48] Notice & 175.

[49] Notice & 176.

The Commission asks whether it should adopt the T1S1.6 proposed technical requirements for thousands-block pooling as the standard for a national pooling architecture or, in the alternative, whether it should direct the NANC to recommend technical standards for thousands-block pooling once such standards have been adopted by ANSI.[50] The Commission should let the standards body, T1S1, set the technical standards and should not either try to do that job itself or turn it over to the NANC.

ii. Administration

Bell Atlantic supports the INC=s guidelines as the standard for national number pooling administration. However, these guidelines do not yet address how the pooling administrator should be treated in jeopardy lottery situations. An issue was introduced at the INC recently to initiate industry discussions on this topic.

The Commission should ask the NANC for a recommendation regarding what entity should serve as the pooling administrator and the criteria used by the NANC to evaluate potential pooling administrators.[51] Unless an updated review results in a significantly different cost proposal, the NANPA=s role should be expanded to include thousands-block pooling administration.

Bell Atlantic does share the concerns raised about possible hegemony over all nationwide number administration matters.[52] When the industry and the Commission was selecting number portability administrators, it was thought to be a significant benefit that this responsibility would be divided between two different entities X that condition, of course, no longer exists. A single entity that functioned as NANPA, NXX administrator, number portability administrator and

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[50] Notice & 178,

[51] Notice & 184.

[52] Notice & 185.

pooling administrator for the entire country would have authority unprecedented in this industry. The industry and the Commission need to be careful such an entity has proper direction and controls.

The Commission seeks comment on Awhether setting a 10% threshold contamination level will harm a particular segment of the industry.≅[53] A uniform contamination level for block donation for all carriers is competitively neutral. Arguments that a 10% contamination level is somehow harmful to a particular segment do not ring true. They are just attempts by some parties to retain blocks for which they have no forecasted demand. The Commission should keep in mind that the industry guidelines allow all carriers to retain a nine-month inventory based upon forecasted demand. This should be more than adequate to ensure that each carrier has sufficient resources.

It should also be noted that there will be diminishing returns on resource donation as the contamination level is increased, while at the same time increasing the complexity and cost of block donation due to higher levels of intra-service provider ports that will be required for each block that is donated.

The Commission should reject MediaOne=s proposal that the contamination level for ILECs should be at least 25%, while 10% is appropriate for CLECs.[54] Setting different contamination levels for different carriers or different industry segments would clearly be discriminatory, and MediaOne has offered no good reason why this discrimination is competitively neutral or appropriate. The INC donation guidelines give carriers the ability to retain enough numbering resources to meet nine months of customer demand. Any excess will be donated to the industry pool. The level of these donations in no way provides a competitive advantage for

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[53] Notice & 188.

any one carrier or industry segment.

Vacant thousands blocks should be preserved for future contribution to an industry inventory pool when number pooling becomes available. Bell Atlantic does not, however, recommend the form of sequential number assignment proposed by the Commission.[55] Bell Atlantic proposes the demand-based block activation measure that has been adopted in Massachusetts, Maine, New Hampshire and Connecticut to achieve this objective. This AThousands Block Administration Protocol≅ requires carriers to set aside in a Aholding category≅ (*i.e.*, unavailable for assignment to customers) any vacant thousands block that is not required to meet six months of customer demand. As inventories drop below the six-month inventory or to fill a specific customer request, a carrier will transfer a vacant thousand block from the Aholding category≅ into its inventory of available telephone numbers.[56]

If the Commission does adopt some form of sequential number assignment, it should be limited to areas in which pooling will be implemented within a certain amount of time, as determined by the NANC. All carriers should abide by these requirements. In addition, carriers should have the opportunity to meet specific customer requirements with any number resource at their disposal, which may require non-sequential number assignment.

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[54] Notice & 189.

[55] Notice & 190.

[56] A copy of the guidelines in use in New Hampshire is attached.

iii. Cost Recovery

Section 251(e)(2) gives the Commission the authority to adopt a cost recovery mechanism for both intrastate and interstate costs of number pooling, and an exclusively federal recovery mechanism for number pooling will enable the Commission to satisfy most directly its competitively neutral mandate and will minimize the administrative and enforcement difficulties that might arise were jurisdiction over numbering administration divided. Incumbent LECs= numbering administration costs, including costs incurred as a

result of number pooling, should not be subject to jurisdictional separations, and incumbent LECs should be allowed to recover their costs under the federal cost recovery mechanism.[57]

It is important that the Commission set consistent national cost allocation and recovery rules. Bell Atlantic, therefore, disagrees with the Commission=s proposal to delegate these questions to the states if Awe delegate to state utility commissions the decision-making authority as to whether to implement thousands-block pooling in any area≅ or to allow the state to opt-out of the federal procedures.[58] Most of the costs of number pooling are centralized X in shared industry resources and new and modified telephone company systems and databases. Leaving cost allocation and recovery to the states invites inconsistent treatment of the same investment.

Bell Atlantic also disagrees with the Commission=s proposal to depart from the sound policy developed in its number portability proceeding. For all the reasons that it was logical and reasonable to allow incumbent LECs to recover their number portability costs through an end user surcharge, it is logical and reasonable to allow them to recover their number pooling costs in the same way. The mere fact that the Commission perceives Aconsumers= sensitivity to end-user charges≅[59] is no reason to depart from this approach.

Bell Atlantic does not propose an additional end user charge. Instead, it urges the Commission to allow it to recover these costs either by increasing its existing number portability surcharge by the five cents that it expects would be necessary to recover these costs or by extending the duration of the

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57 Notice && 193-94.

58 Notice & 210.

59 Notice & 204.

number portability tariff for some 13 months.[60] Adjustments of this sort should not produce the kind of outcry that has resulted from the line item surcharges imposed by the long distance companies.[61]

The Commission should follow its number portability approach in determining what costs are recoverable, and it appears that is what the Commission proposes to do in paragraphs 200-09 of the Notice.

The Commission should also follow its number portability precedent and allocate the shared industry costs among all telecommunications carriers, not just those which receive blocks of numbers.[62] The reason for requiring pooling is to conserve telephone numbers and forestall premature exhaust of the NANP. This will benefit all carriers, not just those receiving number, as they will not have to incur the substantial costs of NANP exhaust. As all carriers will benefit, all carriers should pay.[63]

Bell Atlantic would not support Atying cost recovery for pooling to the quantity of numbers held by each carrier.≅[64] It is a carrier=s revenues, not the number of telephone numbers, that should be the allocator. Allocation on the basis of numbers would shift more of the burden to carriers with many low-revenue-producing residential customers and away from those carriers that serve larger business customers.

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[60] These estimates would recover the cost of implementing thousands-block pooling consistent with the standards agreed to by the industry, both Bell Atlantic=s own costs and its portion of the shared industry implementation costs. It does not include on-going costs, primarily because the industry is still negotiating with Lockheed Martin about what those costs will be. The five-cent estimate assumes recovery would begin in March 2000.

[61] End user charges also avoid the problem identified in paragraph 202 that allowing LECs to recover these costs through access charges makes the long distance companies and their customers bear the whole burden of number pooling.

[62] Notice & 202.

[63] Moreover, any other result would not be competitively neutral.

For this same reason, costs should be allocated on the basis of end user revenues not through a per number charge, as suggested in paragraph 205.

[64] Notice & 207.

iv. Transition Issues

As indicated above, the Commission should not pursue ITN pooling at this time. As noted in the NRO report, ITN pooling requires many of the same elements as thousands-block (*e.g.*, LRN/LNP platform, NPAC SMS, neutral pooling administrator). ITN pooling also requires a new component, the "Pooling Administration System" and associated interfaces, to allow a service provider to request and obtain numbering resources. Thus, while it appears that thousands-block pooling can migrate to ITN pooling, there will be a need for significant modifications to the thousands-block pooling architecture.

Unlike ITN, UNP does not build on thousands-block pooling, It requires different processes, system development, guidelines and administration. As the Commission has noted,[65] UNP is not really a conservation method at all, but merely a method to allow a carrier to get access to specific telephone numbers that it may want for some marketing purpose. Even the proponents of UNP have acknowledged this. Further, UNP is not needed to address any new development or problem that exists in the industry.[66]

The Commission asks whether carriers should be allowed to engage in UNP by mutual agreement.[67] While Bell Atlantic usually urges the Commission not to get in the way of voluntary arrangements between carriers, it must do so in this case because it would be inconsistent with the Commission's objectives with respect to accurate forecast and utilization data reporting. When unassigned numbers port from the code/block holder, that carrier can no longer be accountable

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[65] Public Notice at 4, 13 FCC Rcd 22233 (1998) ("UNP allows carriers to transfer unused telephone numbers among themselves, for assignment to a specific customer. The method differs from the two pooling measures described above in that UNP is a bilateral arrangement between two carriers . . . .") (citation omitted).

[66] Carriers have always received requests for telephone numbers which they could not honor, either because the number was already in use or because it was not available in the customer's area or for some other reason.

for providing accurate data with respect to the utilization of those numbers. Absent a neutral UNP administrator, such arrangements could also encourage the selling, brokering and bartering of numbers. UNP would also affect contamination levels which could have a negative effect on thousands-block pooling.

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[67] Notice && 142, 214.

D. Carrier Choice of Numbering Optimization Strategy

The Commission asks whether it should just establish utilization requirements and let each carrier decide how to achieve them.[68] The answer is that it should not, except as described above as to wireless carriers that do not have number portability technology. First, as discussed above, the Commission should not adopt utilization thresholds to begin with. Even if it did, the industry, and therefore its customers, is best served by national standards implemented consistently across the country.

3. Pricing Options

It is good that the Commission is raising the fundamental question of whether the whole system by which carriers get telephone numbers should be changed, especially in a way that might be less Aregulatory≅ and more market driven. However, in this case, today=s strain on numbering resources is not the result of the system by which telephone numbers are assigned X rather, it was produced largely by the introduction of local competition before number pooling and the unexpected growth in consumers= use of the resource (primarily for wireless services and computer and fax lines). Poor utilization of numbers was not caused by Aadministrative allocation rules that fail to recognize the economic value of numbers.≅[69]

The Commission is correct that it would not be possible to replace the existing system in the near term.[70] The existing system should not be changed unless a strong case can be made that the industry and the consumers it serves will be better off. No such case has been made, and Bell Atlantic is skeptical that it could be.

4. Area Code Relief

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[68] Notice & 216.

[69] Notice & 226.

[70] Notice & 227.

Bell Atlantic supports overlays when area codes relief becomes necessary. The benefits of overlays are well recognized[71] and outweigh any disadvantages. Splits are costly and disruptive and should almost never be used. They also introduce dialing confusion by requiring customers to dial some calls one way (seven digits) and other local calls another (ten digits). If the Commission adopts ten-digit dialing of all calls as the national policy, as Bell Atlantic and others urge, the nation will have a uniform dialing plan and the major perceived drawback of overlays will no longer apply, making overlays the clear best choice in all cases.

The Notice correctly identifies the benefits of expanded overlays.[72] However, to avoid the rating and billing issues referenced in the NANC report, it is essential that expanded overlays conform with the boundaries of the underlying existing NPAs from a geographic and jurisdictional perspective (that is, expanded overlays should not include portions of existing NPAs or cross state boundaries).

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[71] See Notice & 250. Overlays are cheaper to implement, both for carriers and customers (as no customer is required to change telephone numbers), and less disruptive in general. Overlay avoid the fragmentation of communities of interest into separate area codes that would be required by splits. Overlays are also less confusing for customers because existing area code boundaries remain intact. Overlays should also be politically easier because they eliminate the line-drawing controversy that every split seems to generate. Experience has shown that customers can adapt to dialing ten digits for local calls within their area code as easily as they did for ten-digit local calls between area codes.

[72] Notice & 254.

The Notice asks Aif the geographic area covered by an NPA is reduced because of a split, could this reduce opportunities for customers to port their numbers that would have existed otherwise.≅[73] This would not be the case because number portability, as defined by the Commission, involves only customers that remain Aat the same location.≅[74] Location portability would, at least initially, be limited to geographic moves within a rate center. If an area code split also split a rate center, then it would limit the range of location portability.

Bell Atlantic has supported and continues to support the Commission=s policy on technology- and service-specific overlays, and the Notice does not provide any reason for a change. Bell Atlantic does not support granting state commissions blanket authority to adopt them. We also note that such overlays would not appear to be consistent with the Commission=s objective for number optimization, as they would increase the likelihood of stranded resources if the demand does not develop as predicted.

Whatever rules the Commission adopts and whatever are the guidelines for area code relief, the Commission should make it clear that these are the rules and that it will grant individual state waivers and exceptions only in extraordinary circumstances. Area code relief has been delayed, with the accompanying harm to consumers, because some states have not taken the Commission=s rules seriously and have assumed that they would be allowed to deviate from them. A clear message from the Commission can prevent this from happening in the future.

Conclusion

Bell Atlantic supports thousands-block pooling among local exchange carriers and the administrative measures as described in these comments. The Commission should also firmly set the industry on a course of uniform ten-digit dialing for all calls.

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[73] Notice & 252.

Respectfully submitted,

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[74] 47 C.F.R. ¬ 52.21(k).

ATTACHMENT

The New Hampshire Telecommunications Industry
Proposed Thousand Block Administration Protocol

The industry submits the following code conservation procedures to promote efficient use of available numbering resources according to current applicable Industry directions and guidelines. These procedures will enhance responsible number assignment principles and will help preserve numbering resources in the event that Thousands Block Telephone Number Pooling is implemented in New Hampshire. These procedures are not intended to imply any position on the eventual implementation of pooling standards in New Hampshire.

Additional Code Conservation Measures

The industry has agreed to modify its current assignment procedures for telephone numbers within NXX codes to achieve the following goals:

To maximize the potential quantity of vacant thousand number blocks to be contributed to an industry inventory pool when the national telephone number pooling platform is implemented.

To minimize the risk of customer impacts.

To minimize the required time and cost of implementation.

To maintain consistency with current applicable industry directions and guidelines.

This proposal is consistent with the current applicable directions and definitions documented in the draft Industry Numbering Committee (ÅINC≅) guidelines[75]. Specifically, this proposal follows number administration techniques which facilitate the efficient use of numbers. These guidelines provide, in part, as follows: Åthe Block Holder shall: establish internal policies and practices that provide for the efficient use and assignment of numbers to end users. These policies and practices shall balance product specifications and market strategies and customer needs with conservation principles to ensure best practices in number utilization. A service provider should assign out of a given block before making assignments out of another block.≅

Concept

Service providers will set aside in a Åholding≅ category, within their telephone number administration systems, vacant thousand number blocks that are considered potential candidates for contribution to an industry inventory pool when the national telephone number pooling platform is implemented in New Hampshire. Each service provider will maintain 6 months of TN resources to be used to meet customer demand. This type of

[75] Å*Thousands Block (NXX-X) Assignment Guidelines*≅, Draft 11, dated September 8, 1998, Section 2.7c

variable demand analysis allows for the different telephone number demand patterns inherent in different geographic areas (e.g. rural central office versus urban central office) and is consistent with current INC Central Office Code Administration Guidelines which employ similar threshold concepts (e.g. months to exhaust). Numbering resources will be moved a block of TNs at a time as required from the service provider=s Aholding≅ category in order to maintain the 6 months of TN inventory or to meet a specific customer requirement. At the time telephone number pooling is implemented in a specific rate center, Local Number Portability (ALNP≅) capable service providers will analyze the thousands blocks residing in their Aholding≅ category as well as any qualified contaminated block for contribution to an industry telephone number pooling inventory pool in accordance with procedures outlined in the final national telephone number pooling guidelines.

NPA 603 Thousand Block Administration Protocol

1. Service providers will continue to operate within the existing national Central Office (CO) Code Assignment Guidelines and/or any Code Jeopardy procedures agreed to by the Industry. This includes, but is not limited to, a service provider=s ability to request additional NPA NXX codes from the Code Administrator when projected customer demand will exhaust the existing TN inventory within 6 months in a code jeopardy situation, the preparation of the required supporting documentation (i.e., Appendix B), and the certification that an NXX code request is in compliance with all requirements outlined in the Central Office Code Assignment Guidelines, Code Jeopardy procedures and the TN assignment principles included herein.

2. Service providers will set aside in a Aholding≅ category (i.e. restrict from assignment in their TN assignment/administration systems) all vacant thousands blocks. A vacant thousands block is defined as a block within which all TNs are available for assignment. Telephone numbers unavailable for assignment, as defined in the draft guidelines[76] include:

Numbers that are working with customers;
Numbers assigned to pending service orders;
Numbers classified as ASoft Dial Tone≅;
Numbers in the aging period;
Reserved Numbers;
Test Numbers;
Wireless Dealer numbering pools;
Wireless Temporary Local Directory numbers (TLDN); and,
Wireless E911 Routing Numbers (pseudo-ANI or Emergency Services Routing Digits).

In addition, numbers available in resale ordering systems would not be available. These

[76] Ibid., Section 3.1

numbers are held for assignment when carriers place resale orders.

3. Service providers will not add to their inventory of available TNs from the holding category for each rate center until there is insufficient inventory to meet six (6) months of projected customer demand. However, if a service provider is unable (via any practicable method, manual or mechanized) to utilize TNs among multiple switches within a rate center, then the 6 month TN inventory will be determined per switch. The six (6) months of projected customer demand will be determined by analyzing the historical demand trends for business and residential customers, seasonal requirements, and volatile growth patterns of certain products and services (e.g. DID, Centrex, new services), per rate center or switch, whichever is applicable.

4. Service providers will release numbering resources in thousand number blocks from the Aholding≅ category to the Aavailable≅ category as required in order to maintain the 6 months inventory supply or to meet a specific customer requirement. Examples of a specific customer requirement would be the need for sequential thousands blocks, a particular number series, or a bona fide customer request for a specific number.

5. At the time telephone number pooling is implemented in a specific rate center, LNP capable service providers will analyze the thousands blocks residing in their Aholding≅ category as well as any qualified contaminated block for contribution to an industry telephone number pooling inventory pool in accordance with the final national telephone number pooling guidelines.

Attachment 1

Excerpt from section 8.4 in the Central Office Code (NXX) Assignment Guidelines:

The following are special conservation procedures that will be invoked in the situation of a jeopardy NPA.

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C. For additional codes for growth, each code holder will certify that existing codes for the switching entity/POI, per service provided by that switching entity or POI, will exhaust within 6 months and will have documented and be prepared to supply as described in Section 4.2, Section 2, and Appendix A (Audits) supporting data in the form of:

1. TNs available for assignments
2. Growth History for 6 months
3. Projected demand for the coming 6 months